
EXHIBIT 1

Defendants' FRCP 26(a)(1) Initial Disclosures

HOWARD & HOWARD ATTORNEYS PLLC

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6 *Attorneys for Defendant M.J. Dean Construction, Inc.*

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 PARNELL COLVIN,

11 Plaintiff,

12 vs.

13 M.J. DEAN CONSTRUCTION, INC.,

14 Defendant.

Case No. 2:20-cv-01765-APG-EJY

DEFENDANTS' FRCP 26(a)(1)
INITIAL DISCLOSURES

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16 Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure and Rule 26.1 of the Local
17 Civil Rules of the United States District Court for the District of Nevada, Defendant M.J. Dean
18 Construction, Inc., hereby submits the following list of witnesses and documents.

19 A. PERSONS LIKELY TO HAVE RELEVANT INFORMATION

20 The following individuals are likely to have discoverable information concerning the issue
21 in this action.

- 22 1. Chris Flanagan, CFO
23 c/o Howard & Howard Attorneys PLLC
3800 Howard Hughes Parkway, Ste. 1000
24 Las Vegas, NV 89169
702-257-1483

25 Mr. Flanagan is expected to testify as to the alleged facts contained within the pleadings.

- 26
27 2. Thomas Glidewell
c/o Howard & Howard Attorneys PLLC
28 3800 Howard Hughes Parkway, Ste. 1000
Las Vegas, NV 89169

HOWARD & HOWARD ATTORNEYS PLLC

702-257-1483

Mr. Flanagan is expected to testify as to the alleged facts contained within the pleadings.

3. David McGrandy
c/o Howard & Howard Attorneys PLLC
3800 Howard Hughes Parkway, Ste. 1000
Las Vegas, NV 89169
702-257-1483

Mr. McGrandy is expected to testify as to the alleged facts contained within the pleadings.

4. Kevin Gutierrez
c/o Howard & Howard Attorneys PLLC
3800 Howard Hughes Parkway, Ste. 1000
Las Vegas, NV 89169
702-257-1483

Mr. Gutierrez is expected to testify as to the alleged facts contained within the pleadings.

5. David McGrandy
c/o Howard & Howard Attorneys PLLC
3800 Howard Hughes Parkway, Ste. 1000
Las Vegas, NV 89169
702-257-1483

Mr. McGrandy is expected to testify as to the alleged facts contained within the pleadings.

6. David Muti
c/o Howard & Howard Attorneys PLLC
3800 Howard Hughes Parkway, Ste. 1000
Las Vegas, NV 89169
702-257-1483

Mr. Muti is expected to testify as to the alleged facts contained within the pleadings.

7. Paul Rosquist
c/o Howard & Howard Attorneys PLLC
3800 Howard Hughes Parkway, Ste. 1000
Las Vegas, NV 89169
702-257-1483

Mr. Rosquist is expected to testify as to the alleged facts contained within the pleadings.

8. John Thomason
c/o Howard & Howard Attorneys PLLC
3800 Howard Hughes Parkway, Ste. 1000
Las Vegas, NV 89169
702-257-1483

Mr. Thomason is expected to testify as to the alleged facts contained within the pleadings.

9. Ricardo Flores
 c/o Howard & Howard Attorneys PLLC
 3800 Howard Hughes Parkway, Ste. 1000
 Las Vegas, NV 89169
 702-257-1483

Mr. Flores is expected to testify as to the alleged facts contained within the pleadings.

10. Any and all necessary rebuttal witnesses, including experts.

11. Any and all of Plaintiff's experts, including, but not limited to, financial and economical providers.

12. Defendant reserves the right to call any witness named by Plaintiff.

B. DESCRIPTION AND LOCATION OF RELEVANT DOCUMENTS

The following documents are located at the law offices of Howard & Howard Attorneys PLLC:

DISCLOSURE NUMBER	DESCRIPTION	BATES NUMBERS
1	Personnel File	DEF 00001 – DEF 00032
2	Wage Records	DEF 00033 – DEF 00044
3	Union Documents	DEF 00045 – DEF 00087

C. COMPUTATION OF ANY CATEGORY OF DAMAGES

Attorney's fees and costs to be determined.

D. RELEVANT INSURANCE OR INDEMNIFICATION AGREEMENTS

Not applicable.

Dated: January 11, 2021

Respectfully submitted,

HOWARD & HOWARD ATTORNEYS PLLC

By: /s/ Robert Rosenthal
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 Construction, Inc.*